UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

Office of the Regional Administrator

October XX, 2020

Robert Taylor, Director
Concerned Citizens of St. John Parish
Mailing Address? (or just by email?)
Reserve, LA ZIP?

Dear Mr. Taylor,

Thank you for your letter dated September 30, 2020, expressing your concerns regarding EPA discontinuing the chloroprene community air monitoring in Laplace, LA. We are committed to working with the community in St. John the Baptist as we ~~seek to identify specific sources of chloroprene levels of concern.~~ fulfill our mission of protecting human health and the environment.

Commented [LJ1]: This was taken from a topline statement prepared for the USA today media inquiry. Since the request is to reconsider the decision to "replace" the community monitoring with continuous monitoring, it might be best to avoid any discussion of the community monitoring with identify sources (which is a continuous monitoring objective.

EPA has been working with the community on issues related to air contaminants for many years and has specifically been conducting ambient monitoring for chloroprene at six locations in the community of LaPlace since May of 2016. The goal of this monitoring effort was to gather longer term data about the ambient chloroprene levels in the LaPlace community, and we have met that goal. As part of this effort, we have collected over 2,500 measurements of the chloroprene concentrations in the community. Since March 2018, when Denka implemented chloroprene emission control measures, average concentrations indicate a significant reduction in the level of chloroprene and a downward trend at all monitoring sites. The final community ambient air monitoring samples were collected on September 26, and EPA removed the community ambient air monitoring network after the last sample collection. Chloroprene data has been posted to the public website, and additional chloroprene data will be posted as soon as it is available. Denka has recently committed to continue their air monitoring efforts in the community through 2021.

EPA began the Continuous Air Monitoring Program in March 2020. The Continuous Air Monitoring Program utilizes SPods to continuously measure concentrations of Volatile Organic Compounds (VOCs). Chloroprene is a VOC. When the VOC measurements exceed a threshold value (a trigger-level), a 24-hour average canister sample is collected and analyzed for chloroprene. The Initial Phase of the Continuous Air Monitoring Program helped EPA identify and address instrument performance issues and modifications to the canister sample triggering methodology. EPA is posting chloroprene sampling results from the Continuous Air Monitoring Program to the Denka Air Monitoring Data Summary Page: [HYPERLINK "https://www.epa.gov/la/denka-air-monitoring-data-summary" \h]. EPA will continue to evaluate the trigger method and trigger levels used to collect samples for the duration of the Continuous Air Monitoring Program.

The Continuous Air Monitoring Program was not designed as a replacement for the Chloroprene Community Monitoring or to measure long term ambient chloroprene levels. Rather, it is designed to

help EPA understand the magnitude and frequency of occasional, but recurring, elevated chloroprene measurements or "spikes" that, as demonstrated by the community ambient monitoring data, contribute significantly to the long-term chloroprene averages. Another objective of the Continuous Air Monitoring Program is to help identify unknown or under-characterized emissions sources or activities at the facility. This continuous monitoring approach may help EPA identify possible actions that Denka could take to further reduce chloroprene in the community. The decision to implement the Continuous Air Monitoring Program is a response to elevated chloroprene measurements from both EPA's and Denka Performance Elastomer's monitoring networks. However, the decision to discontinue EPA's community ambient air monitoring is independent of any results or outcomes from the Continuous Air Monitoring Program.

I thank you for your shared interest in addressing the chloroprene levels in the community of LaPlace. We are encouraged by the overall results following additional emissions controls implemented by the company, leading to observed decreases in chloroprene concentrations in the neighborhoods, and we look forward to analyzing the data from the continuous monitoring system.

Sincerely,

Ken McQueen
Regional Administrator

cc (by email):
Dr. Chuck Carr Brown, Secretary, Louisiana Department of Environmental Quality